

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

1) BRYAN SAMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
1) JOHNSON MATTHEY, INC., d/b/a	)	Case No. 24-cv-00602-SH
TRACERCO, a foreign corporation,	)	Removed from Tulsa County
2) THE UNIVERSITY OF TULSA, a not for-	)	Case No. CJ-2024-4271
Profit Oklahoma Corporation,	)	
3) CHEVRON USA, INC., a foreign	)	
corporation,	)	
4) CHASE ENVIORMENTAL GROUP, INC.	)	
A foreign corporation,	)	
5) CHINA INSTITUTE OF ATOMIC	)	
ENERGY, a foreign corporation,	)	
	)	
Defendants.	)	

**STATUS REPORT ON REMOVED ACTION**

This form must be filed by the removing party at the time of filing the notice of removal or within five (5) days of the filing of the notice of removal in the U.S. District Court. **Note:** Additional sheets may be used as necessary.

**I. State Court Information**

Identify the court from which the case is being removed.	Court: District Court of Tulsa County
Specify the number assigned to the case in that court.	Number: CJ-2024-4271

**II. Style of the Case**

Include all termed/dismissed and pending Plaintiff(s), Defendant(s), Intervenor(s), Counter-Claimant(s), Counter-Defendant(s), Cross-Claimant(s), Cross-Defendant(s), Third-Party Plaintiff(s), and Third-Party Defendant(s). Indicate the party type and the attorney(s) of record for each party.

Party(ies)	Party Type	Attorney(s) of Record (OBA #, Law Firm & Address, 10-Digit Phone #)
Bryan Sams	Plaintiff	G. Gene Thompson, OBA No. 31243 Keri D. Palacios, OBA No. 34175 Charles C. McKaskey, OBA No. 34718 Rachel Farrar, OBA No. 31988 Creek County Law, PLLC 101 E. Lee Ave. Sapulpa, OK 74066 Telephone: (918) 248.0018
Johnson Matthey Inc., d/b/a Tracerco	Defendant	Michael S. Linscott, OBA No. 17266 DOERNER, SAUNDERS, DANIEL & ANDERSON, L.L.P.

		Two West Second Street, Suite 700 Tulsa, OK 74103-3117 Telephone 918.591.5288
Chase Environmental Group, Inc.	Defendant	Robert Betts, OBA No. 21601 <b>PIERCE COUCH HENDRICKSON BAYSINGER &amp; GREEN, LLP</b> Post Office Box 26350 Oklahoma City, Oklahoma 73126-0350 (405) 235-1611 – <i>Telephone</i>
		-and-
		Mark E. Hardin, OBA No. 15297 <b>PIERCE COUCH HENDRICKSON BAYSINGER &amp; GREEN, LLP</b> Post Office Box 239 Tulsa, Oklahoma 74101 Tel. (918) 583-8100
Chevron USA, Inc.	Defendant	Mary Quinn Cooper, OBA No. 11966 <b>MCAFEE &amp; TAFT, PC</b> Two West Second Street, Suite 1100 Tulsa, Oklahoma 74103 (918) 587-0000 – <i>Telephone</i>
		-and-
		Mary Rose Alexander ( <i>pro hac vice</i> ) <b>LATHAM &amp; WATKINS LLP</b> 330 North Wabash Avenue, Suite 2800 Chicago, IL 60611 (312) 876-7700 – <i>Telephone</i>
The University of Tulsa	Defendant	Ryan A Ray, OBA No. 22281 <b>NORMAN WOHLGEMUTH, LLP</b> 3200 Mid-Continent Tower 401 South Boston Ave Tulsa, Oklahoma 74103 (918) 583-7571 – <i>Telephone</i>

### III. Jury Demand

Was a Jury Demand made in State Court? ☒ Yes ☐ Yes, but rescinded ☐ No

Requesting Party(ies)	Date of Request
Plaintiff	November 12, 2024

### IV. Complaints, Counter-Claims, Cross-Claims, Third Party Complaints, and Intervenor Complaints

List all complaint-type documents (Complaints, Amended Complaints, Counter-Claims, Amended Counter-Claims, Cross-Claims, Amended Cross-Claims, Third-Party Complaints, Amended Third-Party Complaints, Intervenor Complaints, and Amended Intervenor Complaints) filed in State Court. Indicate filing party(ies), against whom, and date filed.

<u>Complaint-Type Document(s)</u>	<u>Filing Party(ies)</u>	<u>Against Whom</u>	<u>Date Filed</u>
Petition	Plaintiff	All Defendants	November 12, 2024

**V. Unserved Parties**

List parties not served at time of case removal.

<u>Unserved Party(ies)</u>	<u>Reason(s) for No Service</u>
China Institute of Atomic Energy	Unknown

**VI. Answer**

Was an Answer made in State Court? Yes ☐ No ☒

If **Yes**, indicate document answered, filing party(ies), and date filed.

<u>Document Answered</u>	<u>Filing Party(ies)</u>	<u>Date Filed</u>

**VII. Nonsuited, Dismissed or Terminated Parties**

List party(ies) nonsuited, dismissed or terminated from the State Court action. Indicate date of termination/dismissal.

<u>Nonsuited, Dismissed or Terminated Party(ies)</u>	<u>Date Terminated/Dismissed</u>
None	

**VIII. Remaining Claims of the Parties**

List all pending complaint-type documents from Section IV. Indicate filing party(ies), against whom and date filed.

<u>Pending Complaint-Type Document(s)</u>	<u>Filing Party(ies)</u>	<u>Against Whom</u>	<u>Date Filed</u>
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None

**IX. Pending Motions**

List all contested pending motions. Indicate filing party(ies) and date filed.

Pending Motions	Filing Party(ies)	Date Filed
None		

Removing Party(ies):	<u>Johnson Matthey Inc., d/b/a Tracerco</u>
Attorney Signature:	<u>s/Michael S. Linscott</u>
Printed Name:	<u>Michael S. Linscott</u>
OBA Number:	<u>17266</u>
Law Firm:	<u>Doerner, Saunders, Daniel &amp; Anderson</u>
Address:	<u>2 W. 2<sup>nd</sup> Street, Suite 700</u>
City, State, Zip Code:	<u>Tulsa, OK 74103</u>
10-Digit Phone Number:	<u>918-591-5288</u>
Facsimile:	<u>918-925-5288</u>
Email Address:	<u><a href="mailto:mlinscott@dsla.com">mlinscott@dsla.com</a></u>

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants.

Charles C McCaskey [charles@creekcountylaw.com](mailto:charles@creekcountylaw.com)

G Gene Thompson [gene@creekcountylaw.com](mailto:gene@creekcountylaw.com), [gthompsonlaw@gmail.com](mailto:gthompsonlaw@gmail.com)

I hereby certify that on \_\_\_\_\_ (Date), I served the same document by:

☐ U.S. Postal Service      ☐ In-Person Delivery      ☐ Courier Service      ☐ Email

on the following, who are not registered participants of the ECF System:

Name(s) and Address(es):

*s/Michael S. Linscott*

Signature